

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

LARRIE HOPE #181215,  
PLAINTIFF,

\*

v.

\* CASE NO. 2:07-CV-210-MHT

RICHARD ALLEN, ET AL.,  
DEFENDANT(S)

\*

\*

MOTION FOR DISCOVERY, F.R. CIVIL P. RULE 26  
MOTION FOR PRODUCTION OF DOCUMENTS

COMES NOW LARRIE HOPE #181215 PLAINTIFF, LOCATED AT  
P.O. BOX 150 CELL BLOCK-L (L-6-01A) MT. MEIGS,  
ALABAMA 36057 AND IN THE ABOVE STYLED CAUSE  
MOVES THIS HONORABLE COURT FOR THE FOLLOWING  
REASON:

(1.) ON MARCH 9th, 2007, UNITED STATES MAGISTRATE JUDGE  
HON. SUSAN RUSS WALKER ORDERED DEFENDANTS TO  
IN SECTION 3. IN ADDRESSING THE CLAIMS PRESENTED  
BY THE PLAINTIFF, THE DEFENDANTS SHALL FURNISH  
COPIES OF ALL DOCUMENTS, RECORDS AND REGULATIONS  
RELEVANT TO THE PLAINTIFF'S CLAIMS FOR RELIEF.

\* THE DEFENDANTS HAVE FAILED TO DO SO AS  
ORDERED.

- (2) IN DEFENDANTS ANSWER AND SPECIAL REPORT SUBMITTED ON MAY 17<sup>th</sup>, 2007 DEFENDANTS DID NOT SUBMIT ANY REGULATIONS, RULES OR STANDARD OPERATION PROCEDURES RELEVANT TO PLAINTIFF CLAIMS. SEE SPECIAL REPORT OF DEFENDANTS.
- (3.) IN ORDER FOR PLAINTIFF TO COMPLY WITH F.R.CIV.P. 36 AND PROVE THERE IS A GENUINE ISSUE OF MATERIAL FACT, PLAINTIFF MUST HAVE THE FOLLOWING REQUESTED DOCUMENTS, BECAUSE DEFENDANTS INTENTIONALLY MISLEAD THIS HONORABLE COURT IN THEIR SPECIAL REPORT BY NOT SUBMITTING THEM AS ORDERED.
- (4.) PLAINTIFF REQUEST FOLLOWING DOCUMENTS: COPY OF:
- (A) ADMINISTRATIVE RULES AND REGULATIONS FOR  
— SEGREGATION OF ALABAMA DEPARTMENT OF CORRECTIONS;
  - (B) DISCIPLINARY SEGREGATION RULES AND REGULATIONS;
  - (C) STANDARD OPERATION PROCEDURES #208  
STANDARD OF CONDUCT OF OFFICERS;
  - (D) USE OF FORCE REGULATION OF OFFICERS;
  - (E) CLASSIFICATION MANUAL - SEPTEMBER 1<sup>st</sup>, 2006;

(F) A COPY OF ALL PHYSICAL ALTERCATIONS BETWEEN OFFICERS OF KILBY CORRECTIONAL FACILITY IN THE SEGREGATION UNIT AND GENERAL POPULATION IN THE PAST FIVE (5) YEARS TO PROVE BY DATA OF THE PHYSICAL ABUSE ON INMATES AT KILBY CORRECTIONAL PRISON AND A COPY OF ALL CIVIL SUITS FILED BY INMATES AT KILBY CORRECTIONAL PRISON IN THE PAST THIRTY (30) YEARS.

### CONCLUSION

PLAINTIFF REQUEST THESE DOCUMENT THROUGH THIS HONORABLE COURT LEAVE TO PROVE PLAINTIFF CLAIMS THAT SUPERVISOR OFFICIALS WERE WELL AWARE OF SUBORDINATES ACTIONS OF ABUSE AND THAT DEFENDANTS HAVE A SYSTEM OF COVERING UP THAT ABUSE ON INMATES BY OFFICIALS OF ALABAMA DEPARTMENT OF CORRECTIONS AT KILBY CORRECTIONAL FACILITY.

DONE THIS THE 24<sup>th</sup> DAY OF MAY 20 07.


Larrie Pope #181215

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THE ABOVE AND  
FOREGOING HAS BEEN SERVED BY U.S. MAIL THIS  
THE 24<sup>th</sup> DAY OF MAY 20 07, TO:

HON. CLERK OFFICE  
MIDDLE DISTRICT OF ALABAMA  
UNITED STATES DISTRICT COURT  
P.O. BOX 711  
MONTGOMERY, ALABAMA  
36101-0711 ; AND

OFFICE OF ATTORNEY GENERAL  
11 SOUTH UNION STREET  
MONTGOMERY, ALABAMA  
36130 .

RESPECTFULLY SUBMITTED,  
 Larrie Hope #181215, Pro Se  
LARRIE HOPE #181215 (L-6-01A)  
P.O. BOX 150  
MT. MEZGS, ALABAMA  
36057

-H-

ARLEE Hope  
#181215 (L-6-014)  
P.O. Box 150  
MT. MEZES, ALABAMA  
36057

36101+0711

C/O: Hon. Clerk Office  
MIDDLE DISTRICT of ALABAMA  
UNITED STATES DISTRICT COURT  
P.O. Box 711  
MONTGOMERY, ALABAMA  
36101-0711

